

EXHIBIT 2

From: [Babchinetskaya, Izabella \(Phila\)](#)

Sent: Thursday, August 25, 2022 4:35:00 PM

To: [Powell, Courtney](#)

Cc: ['Holkum, Laura'](#); ['Jonathan Irwin'](#); aago@lawyerscommittee.org; [Leckerman, Jason \(Phila\)](#); [Gavin, Laura \(Phila\)](#); [Swaminathan, Lisa B. \(Phila\)](#); ['Tianna Mays'](#); ['Woody Glass'](#)

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Sensitivity: Normal

Attachments:

DRAFT Joint Motion for Protective Order DMFIRM_404633294(1).DOCX ;

Courtney,

Attached is a draft protective order for your review. Please let us know if you have any questions. We're looking forward to receiving documents tomorrow.

Thanks,

Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Friday, August 19, 2022 4:05 PM

To: 'Powell, Courtney' <cpowell@spencerfane.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; aago@lawyerscommittee.org; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Cc: Holkum, Laura <lholkum@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Thank you, Courtney. We agree to extend the deadline for production of documents to Friday, August 26, 2022, without waiver of our right to argue that any objections to our document requests have been waived.

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Friday, August 19, 2022 3:42 PM

To: Babchinetskaya, Izabella (Phila) <Babchinetskaya@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; aago@lawyerscommittee.org; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Cc: Holkum, Laura <lholkum@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

⚠ EXTERNAL

Attached please find copies of the responses to the discovery requests.

As discussed during the call, the individual Defendants do not have responsive documents. Any responsive documents would be those of the City. We are agreeable to producing those documents now, thereby negating the need for additional requests to the City.

You will also references to a protective order. This is needed in connection with the production of certain human

resource type documents.

As stated, we would respectfully ask until next Friday to finalize the actual document production.

Thank you, Courtney

Courtney Powell Of Counsel
Spencer Fane LLP

9400 N. Broadway Ext., Suite 600 | Oklahoma City, OK 73114
O 405.753.5915
cpowell@spencerfane.com | spencerfane.com

From: Babchinetskaya, Izabella <Babchinetskaya@ballardspahr.com>
Sent: Friday, August 19, 2022 9:37 AM
To: Powell, Courtney <cpowell@spencerfane.com>
Cc: Jonathan Irwin <Jonathan@wardglasslaw.com>; aago@lawyerscommittee.org; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>
Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Courtney,

Please confirm that you're still available for a 12:30 CST call. I will circulate a dial-in.

Thanks,
Izabella

From: Babchinetskaya, Izabella (Phila)
Sent: Thursday, August 18, 2022 10:09 AM
To: 'Powell, Courtney' <cpowell@spencerfane.com>
Cc: Jonathan Irwin <Jonathan@wardglasslaw.com>; aago@lawyerscommittee.org; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>
Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

Because the original deadline for discovery responses was almost a month ago and given the impending class certification deadline, we expect defendants to produce documents that they do not object to by this Friday. If you anticipate this will be an issue, we'll coordinate our schedules to meet during one of the times you listed below.

Best,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Wednesday, August 17, 2022 9:33 PM

To: Jonathan Irwin <Jonathan@wardglasslaw.com>; Babchinetskaya, Izabella (Phila) <Babchinetskayal@ballardspahr.com>

Subject: Re: Hill et al. v. Town of Valley Brook, et al. - RFPs

△ EXTERNAL

Jonathan & Izabella - I am waiting on final approval from our clients. I am told I will have it by Friday. If that is not acceptable, I can be available Friday between 10:00 - 1:00 CST or between 3:30 - 5:00 CST. Courtney

Courtney Davis Powell, Attorney

Spencer Fane LLP

9400 Broadway Ext., Ste. 600, Oklahoma City, Oklahoma 73114

O 405.844.9900

cpowell@spencerfane.com | spencerfane.com

From: Jonathan Irwin <Jonathan@wardglasslaw.com>

Sent: Tuesday, August 16, 2022 9:17 AM

To: Babchinetskaya, Izabella <Babchinetskayal@ballardspahr.com>; Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org <aago@lawyerscommittee.org>; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Courtney:

Although we'd really appreciate receiving the responses today, if you anticipate that we won't receive the responses by Wednesday, August 17, would you please tell me when you're available for a meet-and-confer in the next couple days?

Best,

Jonathan

Jonathan M. Irwin

ASSOCIATE ATTORNEY



Phone: (405) 360-9700 dd (405) 701-3604
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Website: www.wardglasslaw.com
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From: Babchinetskaya, Izabella <Babchinetskaya@ballardspahr.com>

Sent: Tuesday, August 16, 2022 8:20 AM

To: Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

Last week, you indicated that you would send discovery responses by Monday, August 15th, a week past the agreed-upon extended deadline. Again, we have not received Defendants' discovery responses. Please let us know when we can expect them.

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Friday, August 12, 2022 10:35 AM

To: 'Powell, Courtney' <cpowell@spencerfane.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

We responded to your request for a two-week extension, and then also confirmed the two-week extension with AJ Ferate, which he then memorialized over email. Given the impending scheduling deadlines in this case, we don't have much wiggle room, but we are of course willing to extend courtesies as necessary. We look forward to receiving the responses this Monday.

Best,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Thursday, August 11, 2022 5:06 PM

To: Babchinetskaya, Izabella (Phila) <Babchinetskaya@ballardspahr.com>

Subject: Re: Hill et al. v. Town of Valley Brook, et al. - RFPs

⚠ EXTERNAL

Izabella - I apologize for the delayed response. I've been away from my office. apparently, there was some confusion with our darkening as to whether the agreed extension was 2 to 3 weeks. I am working to finalize now and will have them to you by close of business on Monday. I appreciate your patience and I apologize for the miscommunication on our end.

Courtney Powell
(Sent from iPhone)

From: Babchinetskaya, Izabella <Babchinetskaya@ballardspahr.com>

Sent: Wednesday, August 10, 2022 10:40:38 AM

To: Powell, Courtney <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org <aago@lawyerscommittee.org>; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>; Ferate, AJ <AJFerate@spencerfane.com>; Lester, Andy <alester@spencerfane.com>; Davies, Shannon <sdavies@spencerfane.com>

Subject: [EXTERNAL] RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

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Hi Courtney,

The agreed-upon extended deadline for discovery responses was this Monday, August 8th. To date, we have not received any responses. Please let us know when we can expect them.

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)

Sent: Monday, July 25, 2022 12:25 PM

To: 'Powell, Courtney' <cpowell@spencerfane.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

Courtney,

We're very sorry to hear about your loss. Our condolences to you and your family. A two-week extension is fine.

Does Thursday at 2:00 EST work for a call about ESI? We're planning on including a member of our e-discovery team on the call. Please let us know who will join on your end, and we'll send around dial-in information.

Thanks,
Izabella

From: Powell, Courtney <cpowell@spencerfane.com>

Sent: Monday, July 25, 2022 8:03 AM

To: Babchinetskaya, Izabella (Phila) <Babchinetskaya@ballardspahr.com>

Cc: aago@lawyerscommittee.org; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>

Subject: RE: Hill et al. v. Town of Valley Brook, et al. - RFPs

⚠ EXTERNAL

Izabella –

Good morning. I apologize for the delay in responding. My father-in-law passed away unexpectedly last week, and I have (will continue for the next few days) to be away from the office. To that end, could we have a two week extension to get the RFP responses to you?

I agree that it is a good idea to discuss production – I can be available any time on Thursday or Friday to discuss.

Thank you,
Courtney

Courtney Powell Of Counsel
Spencer Fane LLP

9400 N. Broadway Ext., Suite 600 | Oklahoma City, OK 73114
O 405.753.5915
cpowell@spencervane.com | spencervane.com

From: Babchinetskaya, Izabella <Babchinetskaya@ballardspahr.com>
Sent: Tuesday, July 19, 2022 10:04 AM
To: Lester, Andy <alester@spencervane.com>; Ferate, AJ <AJFerate@spencervane.com>; Davies, Shannon <sdavies@spencervane.com>; Powell, Courtney <cpowell@spencervane.com>
Cc: aago@lawyerscommittee.org; Leckerman, Jason <LeckermanJ@ballardspahr.com>; Gavin, Laura <gavinl@ballardspahr.com>; Swaminathan, Lisa B. <SwaminathanL@ballardspahr.com>; Jonathan Irwin <Jonathan@wardglasslaw.com>; Tianna Mays <tmays@lawyerscommittee.org>; Woody Glass <woody@wardglasslaw.com>
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Hi all,

We had previously discussed meeting about ESI protocol. In anticipation of document production, do you have some time this week to discuss the protocol and document production?

Thank you,
Izabella

From: Babchinetskaya, Izabella (Phila)
Sent: Thursday, June 23, 2022 12:50 PM
To: 'alester@spencervane.com' <alester@spencervane.com>; 'ajferate@spencervane.com' <ajferate@spencervane.com>; 'sdavies@spencervane.com' <sdavies@spencervane.com>; 'Powell, Courtney' <cpowell@spencervane.com>
Cc: 'aago@lawyerscommittee.org' <aago@lawyerscommittee.org>; Leckerman, Jason (Phila) <LeckermanJ@ballardspahr.com>; Gavin, Laura (Phila) <gavinl@ballardspahr.com>; Swaminathan, Lisa B. (Phila) <SwaminathanL@ballardspahr.com>; 'Jonathan Irwin' <Jonathan@wardglasslaw.com>; 'Tianna Mays' <tmays@lawyerscommittee.org>; 'Woody Glass' <woody@wardglasslaw.com>
Subject: Hill et al. v. Town of Valley Brook, et al. - RFPs

All,

Please see attached Plaintiffs' First Request for Production of Documents.

Thank you,
Izabella

Izabella Babchinetskaya
2021 Pro Bono Honor Roll – Gold

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